

1 MITCHELL F. BOOMER (SBN 121441)
JoANNA L. BROOKS (SBN 182986)
2 DYLAN B. CARP (SBN 196846)
JACKSON LEWIS LLP
3 199 Fremont Street, 10th Floor
San Francisco, CA 94105
4 Telephone 415.394.9400
Facsimile: 415.394.9401
5

Attorneys for Defendant
6 SIEMENS PRODUCT LIFECYCLE MANAGEMENT
SOFTWARE INC.
7 (formerly known as UGS CORP.)

8
9 IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
10
11 SAN FRANCISCO/OAKLAND DIVISION

12 VANESSA FLINT, Individually and On Behalf
of All Others Similarly Situated,

13
14 Plaintiffs,

15 v.

16 UGS CORPORATION and DOES 1 through
100, inclusive,

17 Defendants.
18
19
20

Case No. C 07 4640 MJJ

(Removed from San Francisco Superior
Court on September 7, 2007; Case
No:CGC-07-465695)

**DECLARATION OF PETER OLSON
IN SUPPORT OF MOTION TO
TRANSFER VENUE**

Date: November 27, 2007
Time: 9:30 a.m.
Courtroom: 11, 19th Floor
Judge: Hon. Martin J. Jenkins

21 I, Peter Olson, hereby declare as follows:

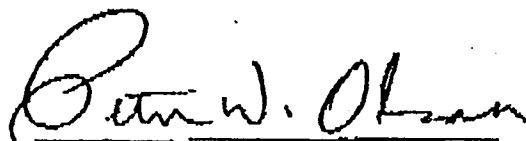
22 1. I am the Director of Human Resources for Siemens Product Lifecycle
23 Management Software Inc. ("Siemens PLM Software") with responsibility for the
24 company's HRIS system. I have personal knowledge of the matters stated herein.
25 Siemens PLM Software is a Delaware corporation with its principal place of business
26 located in Texas. Siemens PLM Software has an office in Cypress, California, which is
27 by far the company's largest office in California.
28

2. Plaintiff Vanessa Flint ("Plaintiff") is employed by Siemens PLM Software as an applications engineer. Aside from three employees in Northern California, all of the California Siemens PLM Software employees with the same job title as Plaintiff work at the Siemens PLM Software office located in Cypress, California. Since those applications engineers work at the Cypress office I believe they reside in or around Southern California.

3. Plaintiff's last known address is 14737 Bordeaux Lane, Chino Hills, CA 91709.

4. Time records reflecting the number of hours Plaintiff worked at Siemens PLM Software are also located in Cypress, California.

Executed this 19 day of October, 2007, at Shoreview Minnesota. I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.


Peter Olson